

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF
TENNESSEE AT CHATTANOOGA

PARAGON COMPONENT SYSTEMS, LLC
Plaintiff

v.

QUALTIM INC., CENTER FOR BUILDING
INNOVATION LLC
DRJ ENGINEERING LLC, INSPIRED
PURSUITS LLC, KIRK GRUNDAHL,
SUZANNE GRUNDAHL

Defendants

Case No.: I :24-cv-00246-CEA-CHS

DEFENDANTS' ANSWER TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION

1. All documents, including without limitation contracts, by which any ownership interest in the Paragon Truss Software was assigned, sold, transferred, licensed, or sublicensed to any of the Defendants.

Answer: Defendant will produce the requested documents but, because of the voluminous nature of the items requested, will instead make them available for Plaintiff's inspection through a files share platform. Access information will be sent to Plaintiff via e-mail within a reasonable period of time.

2. All documents, including without limitation contracts, by which any ownership interest in the Paragon Truss Marks was assigned, sold, transferred, licensed, or sublicensed to any of the Defendants.

Answer: Defendant will produce the requested documents but, because of the voluminous nature of the items requested, will instead make them available for Plaintiff's inspection through

a files share platform. Access information will be sent to Plaintiff via e-mail within a reasonable period of time.

3. All documents, including without limitation contracts, by which any ownership interest in any trade secrets, inventions (whether reduced to practice or not), patents, trademarks, copyrights, or other intellectual property rights in the Paragon Truss Software was assigned, sold, transferred, licensed, or sublicensed to any of the Defendants.

Answer: Defendant will produce the requested documents but, because of the voluminous nature of the items requested, will instead make them available for Plaintiff's inspection through a files share platform. Access information will be sent to Plaintiff via e-mail within a reasonable period of time.

4. All documents, including without limitation contracts, by which any of the Defendants assigned, sold, transferred, licensed, or sublicensed any right, title, or interest in the Paragon Truss Software to Paragon or any other third party.

Answer: Defendant will produce the requested documents but, because of the voluminous nature of the items requested, will instead make them available for Plaintiff's inspection through a files share platform. Access information will be sent to Plaintiff via e-mail within a reasonable period of time.

5. All documents identifying any trade secrets in the Paragon Truss Software that any Defendant assigned, sold, transferred, licensed, or sublicensed to Paragon or any other third party.

Answer: Defendant will not produce these documents for the reason that Defendants did not assign, sell, transfer, license, or sublicensed to Paragon or any other third party.

6. All documents, including without limitation contracts, by which any of the Defendants assigned, sold, transferred, licensed, or sublicensed any inventions (whether reduced to practice or not),

patents, trademarks, copyrights, or trade secrets in the Paragon Truss Software to Paragon or any other third party.

7. **Answer:** Defendant will not produce these documents for the reason that Defendants did not assign, sell, transfer, license, or sublicense any inventions (whether reduced to practice or not), patents, trademarks, copyrights, or trade secrets in the Paragon Truss Software to Paragon or any other third party.
8. All documents that Defendants may seek to introduce as evidence at any trial or hearing in this action for the purpose of proving that one or more of the Defendants has an ownership interest in, or any right or title to, any of the Paragon Truss Software, Paragon Truss Marks, trade secrets owned by Paragon, or other intellectual property owned by Paragon.

Answer: Defendant will produce the requested documents but, because of the voluminous nature of the items requested, will instead make them available for Plaintiff's inspection through a files share platform. Access information will be sent to Plaintiff via e-mail within a reasonable period of time.

9. All documents that Defendants rely upon in support of any denial, whether in whole or in part, for each of Plaintiffs Requests for Admission.

Answer: Defendant will produce the requested documents but, because of the voluminous nature of the items requested, will instead make them available for Plaintiff's inspection through a files share platform. Access information will be sent to Plaintiff via e-mail within a reasonable period of time.

These responses are based on discovery available as of the date hereof. Further discovery, independent investigation, or other analysis may lead to the discovery of additional information or documents, which may lead to additions or changes to the responses set forth herein. These

responses are given without prejudice to Defendants' right to produce or rely on subsequently discovered information or documents.

This 10th day of January, 2025

/s/ Mayville La Rosa

Mayville La Rosa, WI Bar# 1119613

Attorney for Defendants

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Defendants

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DEFENDANTS' ANSWER TO PLAINTIFF'S SECOND REQUEST FOR ADMISSIONS

29. Admit that document filed as Document 53-2 in this action is authentic.

Answer: Defendants object to this request because the request is not relevant to any claim presently in the litigation and it is not likely to lead to the discovery of admissible evidence concerning any pending claim. The request is untimely as being served prior to the court having ruled on the Plaintiff's motion to amend or supplement the Initial Complaint to add allegations as to tortious interference. Defendants will respond to this request upon the Court's ruling on Paragon's motion to amend or supplement the Initial Complaint.

30. Admit that that the document filed as Document 53-3 in this action is authentic.

Answer: Defendants object to this request because the request is not relevant to any claim presently in the litigation and it is not likely to lead to the discovery of admissible evidence concerning any pending claim. The request is untimely as being served prior to the court having ruled on the Plaintiff's motion to amend or supplement the Initial Complaint to add allegations as to tortious interference. Defendants will respond to this request upon the Court's ruling on Paragon's motion to amend or supplement the Initial Complaint.

31. Admit document filed as Document 53-4 in this action is authentic.

Answer: Defendants object to this request because the request is not relevant to any claim presently in the litigation and it is not likely to lead to the discovery of admissible evidence concerning any pending claim. The request is untimely as being served prior to the court having ruled on the Plaintiff's motion to amend or supplement the Initial Complaint to add

allegations as to tortious interference. Defendants will respond to this request upon the Court's ruling on Paragon's motion to amend or supplement the Initial Complaint.

Respectfully submitted January 13, 2025.

/s/ Mayville La Rosa

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